

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

GERMAIN W. JOYNER

a/k/a GERMAIN WILLIAM JOYNER

a/k/a GERMAIN JOYNER

Debtor

CARRINGTON MORTGAGE SERVICES, LLC

Movant

vs.

GERMAIN W. JOYNER

a/k/a GERMAIN WILLIAM JOYNER

a/k/a GERMAIN JOYNER

Debtor

JACK N. ZAHAROPOULOS

Trustee

CHAPTER 13

CASE NO.: 5:19-bk-04208-MJC

ANSWER TO MOTION FOR RELIEF
ON BEHALF OF DEBTOR

AND NOW comes the Debtor, Germain W. Joyner, by and through his attorneys, and answers the Motion for Relief from Automatic Stay by Carrington Mortgage Services, LLC, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied. Debtor denies that the instant bankruptcy was filed in order to delay state court proceedings.
9. Denied. This paragraph contains legal conclusions. To the extent the Court finds this paragraph contains factual allegations, such allegations are denied.
10. Denied. After reasonable investigation, Debtor is without information sufficient to respond to this averment.

11. Denied. Legal conclusion to which no response is required.
12. Admitted in part, denied in part. Admitted as to the value of the property in Schedule D.
The remaining allegations are denied as legal conclusions to which no responses are required.
13. Denied. Legal conclusion to which no response is required.
14. Denied. Legal conclusion to which no response is required.
15. Admitted.
16. Denied. Legal conclusion to which no response is required.

WHEREFORE, Debtor respectfully requests the Court deny the Motion for Relief.

Respectfully Submitted,

NEWMAN WILLIAMS, P.C.

By: /s/ Robert J. Kidwell, Esq. _____
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